

August 6, 2021

VIA ECF ONLY

Hon. John Michael Vazquez
United States District Judge
United States P.O. & Courthouse
Federal Square
Newark, New Jersey 07101

Re: *USA v. Andrews, et al.*
Criminal No. 20-578-JMV

New York Office
800 Third Avenue, 28th Floor
New York, New York 10022
t: 212.344.4619

Short Hills Office
830 Morris Turnpike, 3rd Floor
Short Hills, New Jersey 07078
t: 973.467.1325

Rockland Office
2 Executive Boulevard, Suite 300
Suffern, New York 10901-8219
t: 845.357.7900

Dear Judge Vazquez:

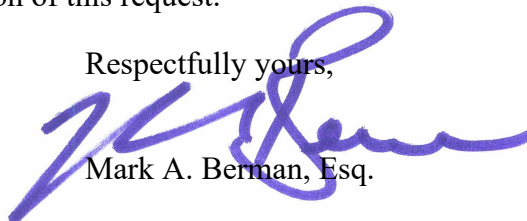
This firm represents Defendant Adam Brosius in the above-referenced matter. Pretrial motions currently are due to be filed on or before August 13, 2021. Counsel requests a 60-day extension of time within which to file pretrial motions, with the consent of all defense counsel. Since first communicating with the Court regarding this request, AUSA Gould has confirmed that he does not object to it.

The reasons for this request are as follows:

- 1) After the deadline for pretrial motions was set by the Court, counsel had two complex cases scheduled for trial on August 3, 2021 (before Judge Martini) and September 9, 2021 (before Judge Wolfson). The August 3, 2021 trial has since been moved to October 12, 2021. It now appears that the September trial will result in a plea but counsel has spent much of the past two months preparing for both of these trials.
- 2) Counsel continue to review the substantial quantity of documents produced by the government in discovery but that review has not been completed, as previously expected, as a result of the trial preparation referenced in the above paragraph.
- 3) The government will not be prejudiced by the requested extension because the Court has given trial priority to matters involving incarcerated defendants and, consequently, it seems unlikely that this complex matter involving multiple defendants who have been granted pretrial release will be scheduled for trial in the near future.

Thank you for the Court's consideration of this request.

Respectfully yours,



Mark A. Berman, Esq.

cc: All Counsel of Record (via ECF)